

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
v.) Criminal Action No. 06-73-GMS
)
DION L. BARNARD,)
)
Defendant.)

GOVERNMENT'S REQUEST FOR SPECIAL VOIR DIRE

NOW COMES the United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Shannon Thee Hanson and Lesley F. Wolf, Assistant United States Attorneys, and hereby requests that the Court submit the following questions to the jury panel in the above-captioned case:

1. Do you know (witness list to be supplied)?
2. This case involves various narcotics charges. Is there anything about the nature of the charges that would prevent you from being an impartial juror?
3. Have you, or any close relative, ever been investigated by the Drug Enforcement Administration or the Delaware State Police?
4. Would the fact that the Drug Enforcement Administration and the Delaware State Police were involved in the investigation in this case interfere with your ability to be fair and impartial?
5. Have you served on a jury for a criminal case or on a Grand Jury before?
6. Other than traffic offenses, have you or any members of your family ever been the subject of a criminal investigation and/or charged with a criminal offense?
7. Have you or any members of your family been charged with a drug crime?

8. Do you believe that the possession, sale or use of drugs should be legalized?
9. Have you or any close relative ever undergone an inpatient or outpatient drug treatment program?
10. Have you ever testified in a criminal case?

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By: /s/ Lesley F. Wolf
Shannon Thee Hanson
Lesley F. Wolf
Assistant United States Attorneys
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Dated: March 18, 2008

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CERTIFICATE OF SERVICE

I, Lesley F. Wolf, employed with the Office of the United States Attorney for the District of Delaware, hereby certify that on the 18th day of March, 2008, I caused to be filed the Government's Proposed Special Voir Dire with the Clerk of Court via CM/ECF. I further certify that a copy of the foregoing was sent, via electronic mail and First Class Mail postage pre-paid on March 18, 2008 to counsel of record as follows:

Joseph A. Ratasiewicz, Esq.
Front Street Lawyers
2 W. Baltimore Avenue, Suite 320
Media, PA 19063

s/Lesley F. Wolf